



December 16, 2013

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Via Email and First Class Mail

Daniel G. Booth, Esq.
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Re: *Shirokov v. Dunlap, Grubb & Weaver PLLC*
U.S.D.C. D. Mass. No. 1:10-cv012043-GAO
Our File No.: 09305.00037

Dear Dan and Jason:

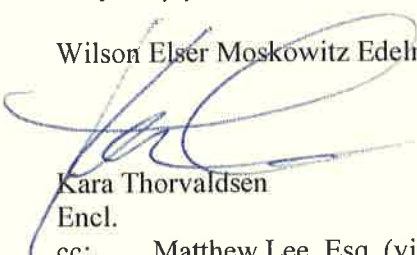
Enclosed please find the following document:

1. OFFER OF JUDGMENT PURSUANT TO FED. R.CIV. P. 68.

Please treat this as superseding the Offer of Judgment previously served on December 3, 2013. We look forward to hearing from you. Thank you.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Kara Thorvaldsen
Encl.

cc: Matthew Lee, Esq. (via email)

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DMITRIY SHIROKOV, on behalf of himself
and all others similarly situated

Plaintiff,

v.

DUNLAP, GRUBB & WEAVER, PLLC; US
COPYRIGHT GROUP; THOMAS DUNLAP;
NICHOLAS KURTZ; GUARDALEY, LIMITED;
and ACHTE/NEUNTE Boll Kino
Beteiligungs Gmbh & Co KG,

Defendants.

Case: 1:10-cv-12043-GAO

OFFER OF JUDGMENT PURSUANT TO FED. R.CIV. P. 68

Pursuant to Fed. R.Civ. P. 68, defendant Dunlap, Grubb & Weaver, PLLC (“the defendant”) in the above captioned matter hereby offers to allow judgment to enter against it in the amount of \$3,179.52 (Three Thousand, One Hundred, Seventy Nine Dollars and Fifty Two Cents) plus reasonable costs and attorneys’ fees incurred to date in connection with bringing an individual claim against the defendants, in an amount to be determined by the Court upon submission of a petition by plaintiff, to which the defendant shall have the right to respond, in exchange for the dismissal of the Second Amended Complaint as to defendants U.S. Copyright Group, Thomas Dunlap, and Nicholas Kurtz, with prejudice and with all rights of appeal waived. This offer of judgment is made for the purposes specified in Rule 68, and is not to be construed as an admission that the defendants are liable in this action.

If plaintiff Dmitriy Shirokov (“the plaintiff”) accepts the Offer of Judgment, he shall, within fourteen days after the service of this Offer of Judgment, serve written notice of

acceptance upon the defendant. If the plaintiff does not serve such written notice within fourteen days after service of the Offer of Judgment, it shall be deemed withdrawn. If the judgment that the plaintiff finally obtains is not more favorable than the unaccepted offer, the plaintiff must pay the costs incurred by the defendant after the offer was made pursuant to F.R.Civ. P. 68.

Dunlap, Grubb & Weaver, PLLC,
US Copyright Group,
Thomas Dunlap, and Nicholas Kurtz

By their Attorneys,

A handwritten signature in blue ink, appearing to be "George C. Rockas", is written over a horizontal line.


George C. Rockas BBO# 544009
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Certificate Of Service

I, Kara Thorvaldsen, hereby certify that the foregoing document has been served this 16th day of December, 2013 on counsel of record by first class mail, postage prepaid, as follows:

Daniel G. Booth BBO # 672090
Jason E. Sweet BBO # 668596
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Kara Thorvaldsen